

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: CARON WIRTH :Bankruptcy No. 24-10158  
: Debtor : Chapter 13

**ANSWER TO MOVANT'S MOTION FOR RELIEF FROM THE AUTOMATIC STAY**

CARON WIRTH, through her attorney, Zachary Perlick, Esquire, answers movant's Motion for Relief, and sets forth in support thereof as follows:

1. - 6. Admitted.  
7.- 10. Admitted. By way of further answer, debtor would like to enter into a loan modification.

11. Denied. Movant is adequately protected by debtor's payments to the Chapter 13 Trustee, equity in the property and insurance coverage.

12. No answer is required.

13. Denied.

14. No answer is required.

15. Denied.

WHEREFORE, Debtor prays that movant's Motion for Relief be DENIED.

Respectfully submitted,

/Zachary Perlick/  
ZACHARY PERLICK, ESQUIRE